

Paul Pejman Edalat
 Olivia Karpinski
 Farah Barghi
 Sentar Pharmaceuticals, Inc.
 EFT Global Holdings, Inc.
 Defendants and Counter/Cross-
 Defendants, Responding to Motion by
 their Attorney to Withdraw

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

BRUCE CAHIL ET AL.) Case No. SACV 16-00686
)
Plaintiff,) RESPONSE OF UNDERSIGNED CLIENTS
) AND CROSS/COUNTER-DEFENDANTS
v.) PAUL PEJMAN EDALAT, OLIVIA
) KARPINSKI, FARAH BARGHI, SENTAR
PAUL PEJMAN EDALAT ET AL.) PHARMACEUTICALS INC. AND EFT
) GLOBAL HOLDINGS, INC. TO
Defendants.) APPLICATION BY THEIR ATTORNEYS
) FOR LEAVE TO WITHDRAW [DKT 199]
)
AND ASSOCIATED CROSS AND) Hearing date:
COUNTER-CLAIMS) April 3, 2017
) 10am
) Courtroom of the
) Hon. Andrew J. Guilford
)
)
)
)
)

1 The undersigned clients and cross/counter-defendants PAUL
2 PEJMAN EDALAT, OLIVIA KARPINSKI, FARAH BARGHI, SENTAR
3 PHARMACEUTICALS INC., AND EFT GLOBAL HOLDINGS, INC. respond to
4 the application of their attorneys Ford & Diulio to withdraw
5 from the pending case.

6 Clients do not oppose the withdrawal per se but take issue
7 with the statement in the application that the withdrawal will
8 not cause a delay in the case, otherwise prejudice clients, and
9 that there is sufficient time for new counsel to come in and try
10 the case on the currently scheduled date of June 13, 2017.

12 This case involves numerous parties and complex claims and
13 counter- and cross-claims involving alleged securities fraud,
14 RICO, breach of fiduciary duty, and sexual harassment. A few
15 key depositions remain to be concluded, including the final
16 remaining stipulated deposition of lead Plaintiff. Furthermore,
17 Plaintiff and counter claim defendants have yet to substantively
18 respond to written Discovery. As presently constituted all
19 claims and cross/counter-claims are scheduled to be tried in one
20 trial, which by the scheduling order is confined to three days.
21 This issue alone needs to be analyzed because many of the issues
22 are disparate (for example, securities fraud on the one hand,
23 sexual harassment on the other). Bifurcation may be in order.
24 It does appear that the parties through their counsel have not
25 addressed these procedural complexities or (so far as appears)
26 arrived at a comprehensive pretrial order that might
27
28

1 appropriately bifurcate issues or define the issues for trial.

2 Clients have made energetic efforts to secure new counsel
3 immediately. However any new counsel will seek, and may require,
4 a continuance of the trial date in order to have sufficient time
5 to prepare and not disadvantage or prejudice Clients' rights. A
6 continuance may be in order regardless to allow an adequate
7 pretrial. The pending application filed by Ford and Diulio
8 incorrectly suggests that no continuance will be in order or
9 will be necessary.
10

11 Clients respectfully request the court to require their
12 current attorney to seek a trial continuance or at least an
13 adequate pretrial order with appropriate bifurcation of issue.
14 At the very least current counsel must address these issues with
15 the Court and opposing side, prior to withdrawal from the case.
16

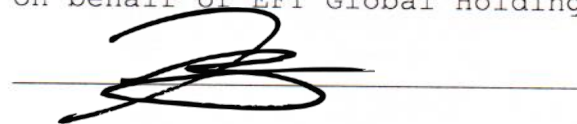
17 Respectfully submitted:

18 Dated: ~~March 29, 2017~~



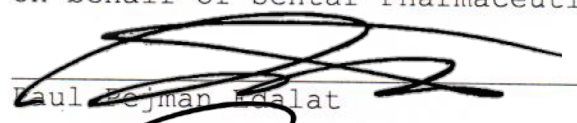
19 on behalf of EFT Global Holdings Inc.

20 Dated: ~~March 29, 2017~~



21 on behalf of Sentar Pharmaceuticals, Inc.

22 Dated: ~~March 29, 2017~~



23 Paul Pejman Adalat

24 Dated: ~~March 29, 2017~~



25 Farah Barghi

26 Dated: 3/29/2017



27 Olivia Karpinski
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, March 29, 2017, the foregoing document was filed via the Central District of California CM/ECF system, which will send notification of such filing to all counsel of record who have consented to electronic service.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 29, 2017, at Costa Mesa, California.
s/ Kristopher P. Diulio